

Before the  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Modifications of Mail Classification Schedule  
for International Mail

Docket No. MC2020-7

PUBLIC REPRESENTATIVE COMMENTS

(November 6, 2019)

On October 9, 2019, the Postal Service filed a notice of minor classification changes governing international mail pursuant to 39 C.F.R. § 3020.90.<sup>1</sup> On October 10, 2019, the Commission issued an order to obtain public comments and appointed the undersigned Public Representative.<sup>2</sup>

The Postal Service asserts that the purpose of the minor classification changes is to modify the country price list for international mail appearing in Part D of the Mail Classification Schedule (MCS) “to conform to official sources and improve the accuracy of the product descriptions in the MCS.” Notice at 1. The Postal Service proposes an effective date of January 26, 2020 to coincide with the effective date of the Market Dominant and Competitive price changes filed in Docket Nos. R2020-1 and CP2020-5, respectively.<sup>3</sup>

The Public Representative has reviewed the Notice, proposed classification changes, and applicable statutory and regulatory provisions. First, the Public Representative finds that the proposed changes will “ensure that product descriptions in the [MCS] accurately represent” the Postal Service’s current offerings by conforming the country price list for international mail to official sources. See 39 C.F.R. § 3020.90(a); Notice at 1. Second, the Postal Service filed notice of the minor classification changes at least 15 days before the proposed effective date of January 26, 2020. See 39 C.F.R. § 3020.90(b). Third, the

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<sup>1</sup> Notice of United States Postal Service of Minor Classification Changes, October 9, 2019 (Notice).

<sup>2</sup> Notice and Order Concerning Minor Classification Change, October 10, 2019 (Order No. 5270).

<sup>3</sup> *Id.*; see Docket No. R2020-1, United States Postal Service Notice of Market Dominant Price Change, October 9, 2019; Docket No. CP2020-5, United States Postal Service Notice of Changes in Rates of General Applicability for Competitive Products, October 9, 2019.

proposed classification changes do not constitute material changes to the product description because no changes to the applicable prices or price groups will be made. See *id.* § 3020.90(c)(1); Notice at 2. Fourth, the proposed corrections are consistent with title 39 because “[t]he proposed modifications do not significantly change the user experience for any product and there is no evidence that the proposed modifications will significantly impact competitors.” Notice at 2; see 39 C.F.R. § 3020.90(c)(2). Fifth, the Notice includes applicable sections of the MCS and proposed corrections in legislative format. Notice at 4; see 39 C.F.R. § 3020.90(c)(3).

Based on this review, the Public Representative concludes that the proposed MCS changes are minor classification changes that comply with 39 C.F.R. § 3020.90.

Respectfully submitted,

Katrina R. Martinez  
Public Representative